



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

January 22, 2025

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square,
New York, NY 10007

Application granted. The parties shall file a status update by March 24, 2025. Time is excluded until March 24, 2025, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h) (7)(A).

SO ORDERED.

Re: *United States v. Sonny Saratoga*, 21 Cr. 560 (RA)

Ronnie Abrams, U.S.D.J.
January 23, 2025

Dear Judge Abrams:

The Government respectfully submits this letter on behalf of both parties, in response to the Court's July 22, 2024 order (Dkt. 31), to provide the Court with a status update on this matter. As the Court is aware, most recently on July 22, 2024, the Court granted the parties' joint letter adjourning trial in this matter until the defendant's state case pending in Bronx Supreme Court on factually overlapping charges has resolved. (*Id.*). The Government has communicated with the Assistant District Attorney handling the defendant's state case, and reviewed the docket of the defendant's state case, and learned that the defendant's state case is expected to have its next appearance on February 19, 2025, and that the matter expects to proceed to trial. Accordingly, the parties respectfully request that the Court set a new date in approximately six months for the parties to provide the Court with an additional status update, which would likely be after the defendant's state trial has concluded, accounting for the possibility of a trial adjournment, and any discussions about pretrial dispositions that could occur after the conclusion of the defendant's state case.

In addition, the Government requests, with the consent of the defendant, by and through defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today until the date that the parties will provide the Court with a new status update. Such an exclusion is in the interest of justice so that the parties can continue discussions regarding a pretrial disposition after the defendant's state case is resolved.

Respectfully submitted,

DANIELLE R. SASSOON
United States Attorney

by: /s/
Ni Qian/Michael Herman
Assistant United States Attorneys
(212) 637-2364 / -2221